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June 17, 2013

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Office of Air, Waste & Toxics

Ms. Jan Palumbo (AWT-121) United States EPA, Region 10 1200 Sixth Avenue, Suite 900 Seattle, WA 98101

Subject:

June 2013 Progress Report

J.H. BAXTER ARLINGTON FACILITY Docket No. RCRA-10-2001-0086

Dear Ms. Palumbo:

This letter provides the June 2013 progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from May 15, 2013, to June 15, 2013.

SIGNIFICANT DEVELOPMENTS THIS PERIOD

This section discusses significant developments for the reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- On May 21, 2013, Baxter received a letter from EPA requesting a work plan for a pilot study for chemical oxidation study.
- During the week of June 3, 2013, Baxter conducted the routine second quarter 2013 quarterly monitoring activities.
- On June 11, 2013, Baxter submitted to EPA the Fourth Quarter 2012 Operations and Monitoring Report.
- The Remedial Action Pilot System has operated at a reduced capacity during the reporting period. Baxter is developing plans for maintenance activities that will be performed as soon as practical to improve system flow rate and uptime.

ANTICIPATED DEVELOPMENTS NEXT PERIOD

This section discusses developments anticipated during the next reporting period, as outlined below:

Baxter will submit a Pilot Study Work Plan and the First Quarter 2013 Operations and Monitoring Report during the next reporting period.

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OTHER INFORMATION

Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

· Baxter has no other information to report.

CERTIFICATION

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate, and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:

Name:

Georgia Baxter

Title:

Chief Executive Officer

Date:

June 17, 2013

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (650) 349-0201.

Sincerely,

Georgia Baxter

Chief Executive Officer

CC:

Jeanne Tran, Ecology

Jamie Hillery, Stella-Jones Corp. RueAnn Thomas, Nattura Group

J. Stephen Barnett, AMEC

